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9 *Attorney for Defendant Turtle & Hughes, Inc.*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

INTERIOR ELECTRIC INCORPORATED
NEVADA, a domestic corporation,

Plaintiff,

v.

T.W.C. CONSTRUCTION, INC., a Nevada
corporation; TRAVELERS CASUALTY AND
SURETY COMPANY OF AMERICA, a
Connecticut corporation; MATTHEW RYBA, an
individual; GUSTAVO BAQUERIZO, an
individual; CLIFFORD ANDERSON, an
individual; POWER UP ELECTRIC COMPANY,
a Nevada limited liability company; PROLOGIS,
L.P., a Delaware limited partnership; AML
PROPERTIES, INC., a Nevada corporation; AML
DEVELOPMENT 3, LLC, a Nevada limited
liability corporation; LAPOUR PARTNERS, INC.,
a Nevada Corporation; DON FISHER, an
individual; PHILCOR T.V. & ELECTRONIC
LEASING, INC., a Nevada corporation, dba
NEDCO; QED, INC., a Nevada corporation;
TURTLE & HUGHES, Inc., a New Jersey
corporation; DOES I-X, inclusive; and ROE
CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:18-CV-01118

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT TURTLE & HUGHES TO
RESPOND TO COMPLAINT**

(First Request)

1 Defendant Turtle & Hughes, Inc. ("T&H"), by and through their counsel of record, the law
2 firm of Procopio, Cory Hargreaves & Savitch, LLP, and Plaintiff Interior Electric Incorporated
3 Nevada ("Interior Electric" or "Plaintiff"), by and through its counsel of record, the law firm of
4 Marquis Aurbach Coffing and the Law Offices of Philip A. Kantor, P.C., hereby stipulate and
5 agree as follows:

6 WHEREAS, Interior Electric filed the instant action on or about June 22, 2018 against
7 T&H and other defendants;

8 WHEREAS, T&H's initial deadline to respond to Interior Electric's Complaint was
9 purportedly August 3, 2018;

10 WHEREAS, the parties submit this stipulation to confirm that Interior Electric's agreement
11 that the deadline for T&H to respond to the Complaint is extended up through and including
12 August 17, 2018;

13 WHEREAS, the submission of this stipulation is not intended and shall not be considered to
14 be a general appearance or consent by T&H to waive any of its rights or defenses to challenge or
15 otherwise respond to the Complaint, including but not limited to contesting personal jurisdiction,
16 and the parties hereto specifically agree that T&H shall be permitted to challenge the Complaint on
17 any available grounds under Federal Rule of Civil Procedure 12 or otherwise, including on
18 jurisdictional grounds;

19 WHEREAS, there are no other deadlines that are affected by this stipulation and proposed
20 order that are presently known to the parties; and

21 WHEREAS, this stipulation is not entered into for any improper purpose or to delay.

22 THEREFORE, T&H and Interior Electric each hereby stipulate and agree that T&H has up
23 through and including August 17, 2018 in which to respond to Interior Electric's Complaint,
24 including on any available grounds under Federal Rule of Civil Procedure 12 or otherwise,
25 including on jurisdictional grounds.

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1 DATED this 7th day of August, 2018.

2 PROCOPIO, CORY, HARGREAVES & SAVITCH
3 LLP

4 Lance Coburn, Esq.
Nevada Bar No. 6604

5 *Attorneys for Turtle & Hughes, Inc.*

6 DATED this 7th day of August, 2018.

7 MARQUIS AURBACH COFFING

8 Cody S. Mounteer, Esq.,
Nevada Bar No. 11220
Chad F. Clement, Esq.
Nevada Bar No. 12192
Kathleen A. Wilde, Esq.
Nevada Bar No. 12522
10001 Park Run Drive
Las Vegas, Nevada 89145

9 LAW OFFICES OF PHILIP A. KANTOR, P.C.

10 Philip A. Kantor, Esq.
Nevada Bar No. 6701
1781 Village Center Circle, Suite 120
Las Vegas, Nevada 89134

11 *Attorneys for Interior Electric*

12 **IT IS SO ORDERED:** Defendant Turtle & Hughes, Inc. shall have up through and
13 including August 17, 2018 in which to respond to Interior Electric Incorporated Nevada's
14 Complaint, including on any available grounds under Federal Rule of Civil Procedure 12 or
15 otherwise, including on jurisdictional grounds.

16 Dated the 10th day of August, 2018.

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18 UNITED STATES ~~DISTRICT~~ JUDGE
19 Magistrate
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